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May 26, 2022

VIA ECF

Honorable Pamela K. Chen, United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. McMahon, et al.*
Docket No. 21-cr-265

Dear Judge Chen:

As Your Honor may recall, this Firm represents defendant Michael McMahon in the above-captioned matter. We write in response to the Court's May 24, 2022 Order requiring that, "[i]n connection with the government's application pursuant to Section 4 of CIPA," we, as counsel for Mr. McMahon, meet with the Court to discuss Mr. McMahon's "anticipated defense in this case." As requested, we have contacted counsel for defendants Yong Zhu and Congying Zheng, and under the circumstances, have no choice but to seek to meet *ex parte* with the Court individually regarding the Government's application pursuant to Section 4 of CIPA. To that end, we are available anytime on June 2, 2022 and anytime other than 10:30 A.M. on June 3, 2022 (when we have a telephonic conference with another United States District Judge) to meet with Your Honor, at which point we will be fully prepared to discuss Mr. McMahon's anticipated defense in this case.

Please do not hesitate to contact me should Your Honor have any questions or concerns. Thank you very much for your very kind consideration of this matter.

Respectfully submitted,

s/ Lawrence Lustberg

Lawrence S. Lustberg

cc: All counsel of record (via ECF)